Message Text

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E.O. 11652: N/A

TAGS: EAGRE, SWEL, SW

SUBJECT: REQUEST FOR INFORMATION REGARDING BENZO(A)PYRENE IN CATTLE FEED

- 1. BENZOPYRENE IS OF THE CATEGORY OF CHEMICALS REFERRED TO AS POLYCYCLIC AROMATIC HYDROCARBONS AND IS A SUSPECTED CARCINOGEN. FDA IS NOT AWARE OF ANY PROBLEM RELATED TO DRIED GRAIN CONTAMINATION BY BENZO(A)PYRENE.
- 2. THE PRO3LE; DOES EXIST IN "SINGLE-CELL PROTEINS, PRODUCED BY GROWING MICROORGANISMS ON A PETROLEU; SUBSTRATE. POLYCYCLIC AROMATIC HYDROCARBONS ARE NATURALLY-OCCURRING COMPONENTS OF PETROLEUM. THEY ARE DIFFICULT TO REMOVE COMPLETELY AND CAN, AT LEAST IN THEORY, CAUSE RESIDUES TO EXIST IN THE MEAT OR OTHER FOOD PRODUCTS FROM ANIMALS FED "SINGLE-CELL PROTEIS. PRODUCED FROM PETROLEUM.
- 3. FDA HAS RECEIVED PROPOSALS THAT SINGLE-CELL PROTEINS GROWN ON A PETROLEUM SUBSTRATE SHOULD BE PERMITTED FOR USE UNCLASSIFIED

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AS ANIMAL FEEDS. APPROVAL HAS NOT BEEM GIVEN, PARTLY DUE TO INABILITY OF CURRENT ANALYTICAL METHODS TO DEMONSTRATE ABSENCE OF THE POLYCYCLIC HYDROCARBONS AT THE SENSITIVITY CONSIDERED NECESSARY.

4. THE DELANEY AMENDMENT SAYS THAT A CHEMICAL MAY NOT BE USED AS A FOOD ADDITIVE IF IT CAUSES CANCER IN TEST

ANIMALS. A CARCINOGENIC CHEMICAL MAY BE USED AS AN ADDITIVE IN ANIMAL FEEDS IF IT DOES NOT HARM THE ANIMALS AS FED AND IT DOES NOT RESULT IN RESIDUES OF THE CHEMICAL IN THE FOOD PRODUCTS DERIVED FROM THE ANIMALS. SEE SECTION 409 (C) (3) OF THE FEDERAL FOOD, DRUG AND COSMETIC ACT FOR EXACT WORDING. IT IS THIS ABSOLUTE PROHIBITION OF ANY RESIDUES THAT MAKES THE ANALYTICAL CAPABILITY SO CRITICAL. CHRISTOPHER

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